

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

UMG RECORDINGS, INC., *et al.*,

Plaintiffs,

vs.

GRANDE COMMUNICATIONS
NETWORKS LLC and PATRIOT MEDIA
CONSULTING, LLC,

Defendants.

Civil Action No. 1:17-cv-00365

**PLAINTIFFS' CORRECTED¹ MOTION FOR LEAVE TO FILE MOTION TO COMPEL
EXCEEDING TEN PAGES**

Plaintiffs UMG Recordings, Inc., et al, move the Court for leave to file their Motion to Compel Responses to Requests for Production and Interrogatories that exceeds the ten-page limit under the Local Rules and shows as follows:

Disputes have arisen between Plaintiffs and Defendants Grande Communications Networks, LLC (“Grande”) and Patriot Media Consulting, LLC (“Patriot”) concerning Grande’s and Patriot’s responses to Plaintiffs’ requests for production and interrogatories. In particular, Plaintiffs contend that Grande and Patriot have made improper objections and failed to produce relevant documents in response to Plaintiffs’ requests for production to each of them. And Plaintiffs contend that Grande and Patriot have made improper objections and failed to properly answer Plaintiffs’ interrogatories seeking

¹ The version of this motion that Plaintiffs originally filed inadvertently stated that Defendants did not oppose it. At the time of the original filing, Defendants’ counsel had not indicated whether Defendants opposes this motion. Counsel has since stated that Defendants oppose the motion. In addition, due to an error counsel’s signature blocks appeared twice.

relevant information. Despite multiple written communications and three separate conferences between counsel, the parties have been unable to resolve their disputes. Accordingly, Plaintiffs are contemporaneously filing Plaintiffs' Motion to Compel Documents and Information from Defendants ("Motion to Compel"), so the Court can resolve these disputes.

The Motion to Compel addresses four separate discovery responses: Grande's response to Plaintiffs' requests for production; Patriot's response to Plaintiffs' requests for production; Grande's response to Plaintiffs' first set of interrogatories; and Patriot's response to Plaintiffs' first set of interrogatories. Because Grande's and Patriot's objections and responses raise similar issues, Plaintiffs believe that addressing these common issues in one motion is more efficient than filing separate motions directed to each individual discovery response, or directed to each Defendant individually.

Under Local Court Rule CV-7(d)(3) the page limit for a non-dispositive motion is ten pages. It is not feasible to cover all the issues properly in ten pages. The Motion to Compel is approximately fifteen pages long. Plaintiffs ask the Court to grant them leave to file the Motion to Compel in excess of ten pages. Defendants oppose this relief.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies that on August 30, 2017 all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system pursuant to Local Rule CV-5(b)(1).

/s/ Daniel C. Bitting _____
Daniel C. Bitting